



McGuireWoods LLP
1251 Avenue of the Americas
20th Floor
New York, NY 10020-1104
Phone: 212.548.2100
Fax: 212.548.2150
www.mcguirewoods.com

Philip A. Goldstein
Direct: 212.548.2167
pagoldstein@mcguirewoods.com

May 4, 2023

Via ECF

Hon. Ann Marie Donio, U.S.M.J.
United States District Court
District of New Jersey
Mitchell H. Cohen Building & U.S. Courthouse
4th & Cooper Streets
Camden, New Jersey 08101

Re: *Tiffanee Gould, et al. v. The Guida-Seibert Dairy Company, et al.*
Case No. 1:22-cv-01861-NLH-AMD
Request to Modify Scheduling Order to Accommodate Early Mediation

Dear Judge Donio:

This firm represents Defendant The Guida-Seibert Dairy Company in the above-referenced matter and we write on behalf of all parties. Pursuant to this Court's Order for Scheduling Conference (ECF No. 35), the parties are scheduled to appear before Your Honor on May 23, 2023 for an initial scheduling conference. The parties respectfully request the scheduling conference and related deadlines be adjourned for ninety days to allow them time to engage in informal discovery and schedule a private mediation. In doing so, the parties propose the following schedule:

- **May 8, 2023:** last day for parties to submit proposed confidentiality order
- **May 19, 2023:** last day for parties to exchange initial sets of documents, with additional documents produced on a rolling basis
- **May 30, 2023:** last day for parties to meet and confer to discuss mediator selection and parties' respective document productions
- **June 9, 2023:** last day for parties to select mediator and advise court of date of mediation and name of mediator selected
- **August 11, 2023:** last day for parties to conduct mediation (subject to mediator availability)
- **August 18, 2023:** last day for parties to advise court of status of mediation

Accordingly, the parties respectfully request the Court adopt the foregoing schedule and adjourn the initial scheduling conference and related deadlines for a period of ninety days.

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Respectfully submitted,

/s/ Philip A. Goldstein

Philip A. Goldstein

PAG:

cc: All Counsel of Record (via ECF)

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